

Exhibit C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DANA BYRNE, GALE LaCAVA, JOHN CONROY,
PAUL CRESTI, DERRIN HAWKINS, ANNETTE
ILAGAN, ROGER KLEIN, VLADIMIR KVINT,
KEVIN McCausland, BRIAN MENEGHIN,
STEVE MYLENSKI, JAMIE PALAZZOLO,
BELINDA PARK, SEAN ROCHE, SAL
TOMASIELLO, BRIAN WONG,
on behalf of themselves individually and on behalf
of all other similarly situated persons,

12 CIV 8203 (PKC)

Plaintiffs,
v.

**ANSWER TO
SECOND AMENDED
COMPLAINT**

RMJM, INC., RMJM GROUP, INC., RMJM
HILLIER GROUP, INC., RMJM HILLIER
WORLDWIDE, INC., RMJM WORLDWIDE, INC.,
RICHARD BAILES, DECLAN THOMPSON,
FRASER MORRISON and PETER MORRISON,

Defendants.

-----X

Defendants, RMJM, INC., RMJM GROUP, INC., RMJM HILLIER GROUP, INC.,
RMJM HILLIER WORLDWIDE, INC., RMJM WORLDWIDE, INC., RICHARD BAILES,
DECLAN THOMPSON, FRASER MORRISON and PETER MORRISON (hereinafter
collectively referred to as "Defendants"), by and through their attorneys, Bond,
Schoeneck & King, PLLC, hereby appear and answer the Second Amended Complaint
(hereinafter referred to as "Complaint") as follows:

1. DENY the truth of the allegations contained in Paragraph 1 of the
Complaint and respectfully refers the Court to the Complaint for its full form and content.
2. DENY the truth of the allegations contained in Paragraph 2 of the
Complaint.

3. DENY the truth of the allegations contained in Paragraph 3 of the Complaint and respectfully refers the Court to the Complaint for its full form and content.

4. DENY the truth of the allegations contained in Paragraph 4 of the Complaint and respectfully refers the Court to the Complaint for its full form and content.

5. DENY the truth of the allegations contained in Paragraph 5 of the Complaint and respectfully refers the Court to the Complaint for its full form and content.

6. DENY the truth of the allegations contained in Paragraph 6 of the Complaint and respectfully refers the Court to the Complaint for its full form and content.

7. DENY the truth of the allegations contained in Paragraph 7 of the Complaint and respectfully refers the Court to the Complaint for its full form and content.

8. DENY the truth of the allegations contained in Paragraph 8 of the Complaint and respectfully refers all questions of law to the Court.

9. DENY the truth of the allegations contained in Paragraph 9 of the Complaint and respectfully refers all questions of law to the Court.

10. DENY the truth of the allegations contained in Paragraph 10 of the Complaint and respectfully refers all questions of law to the Court.

11. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 11 of the Complaint.

12. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 12 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that Dana Byrne worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

13. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 13 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that Gale LaCava worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

14. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 14 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that John Conroy worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

15. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 15 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that Paul Cresti worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

16. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 16 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that Derrin Hawkins worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

17. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that Annette Ilagan worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

18. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 18 of the Complaint and respectfully refer all

questions of law to the Court except ADMIT that Roger Klein worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

19. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 19 of the Complaint and respectfully refer all questions of law to the Court.

20. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 20 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that Kevin McCausland worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

21. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 21 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that Brian Meneghin worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

22. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 22 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that Steve Mylenski worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

23. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 23 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that Jamie Palazzolo worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

24. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 24 of the Complaint and respectfully refer all

questions of law to the Court except ADMIT that Belinda Park worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

25. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 25 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that Sean Roche worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

26. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 26 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that Sal Tomasiello worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

27. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 27 of the Complaint and respectfully refer all questions of law to the Court except ADMIT that Brian Wong worked at Defendant's place of business at 275 Seventh Avenue, New York, New York.

28. DENY the truth of the allegations contained in Paragraph 28 of the Complaint.

29. DENY the truth of the allegations contained in Paragraph 29 of the Complaint.

30. DENY the truth of the allegations contained in Paragraph 30 of the Complaint and respectfully refers all questions of law to the Court except ADMIT that RMJM, Inc. is a foreign corporation with its primary place of business located in Princeton, New Jersey and was and remains doing business within the State of New York.

31. DENY the truth of the allegations contained in Paragraph 31 of the Complaint and respectfully refers all questions of law to the Court except ADMIT RMJM Group, Inc. is a foreign corporation with its primary place of business located in Princeton, New Jersey and was and remains doing business within the State of New York.

32. DENY the truth of the allegations contained in Paragraph 32 of the Complaint and respectfully refers all questions of law to the Court except ADMIT RMJM Hillier Group, Inc. is a foreign corporation with its primary place of business located in Princeton, New Jersey and was and remains doing business within the State of New York.

33. DENY the truth of the allegations contained in Paragraph 33 of the Complaint and respectfully refers all questions of law to the Court except ADMIT RMJM Hillier Worldwide, Inc. is a foreign corporation with its primary place of business in Princeton, New Jersey and was and remains doing business in the State of New York.

34. DENY the truth of the allegations contained in Paragraph 34 of the Complaint and respectfully refers all questions of law to the Court except ADMIT RMJM Worldwide, Inc. is a foreign corporation with its primary place of business located in Princeton, New Jersey and was and remains doing business within the State of New York.

35. DENY the truth of the allegations contained in Paragraph 35 of the Complaint and respectfully refers all questions of law to the Court.

36. DENY the truth of the allegations contained in Paragraph 36 of the Complaint and respectfully refers all questions of law to the Court.

37. DENY the truth of the allegations contained in Paragraph 37 of the Complaint and respectfully refers all questions of law to the Court.

38. DENY the truth of the allegations contained in Paragraph 38 of the Complaint and respectfully refers all questions of law to the Court.

39. DENY the truth of the allegations contained in Paragraph 39 of the Complaint.

40. DENY the truth of the allegations contained in Paragraph 40 of the Complaint and respectfully refers all questions of law to the Court.

41. DENY the truth of the allegations contained in Paragraph 41 of the Complaint and respectfully refers all questions of law to the Court.

42. DENY the truth of the allegations contained in Paragraph 42 of the Complaint and respectfully refers the Court to the Complaint for its full form and content.

43. DENY the truth of the allegations contained in Paragraph 43 of the Complaint.

44. DENY the truth of the allegations contained in Paragraph 44 of the Complaint.

45. DENY the truth of the allegations contained in Paragraph 45 of the Complaint.

46. DENY the truth of the allegations contained in Paragraph 46 of the Complaint.

47. DENY the truth of the allegations contained in Paragraph 47 of the Complaint.

48. DENY the truth of the allegations contained in Paragraph 48 of the Complaint.

49. DENY the truth of the allegations contained in Paragraph 49 of the Complaint.

50. DENY the truth of the allegations contained in Paragraph 50 of the Complaint.

51. DENY the truth of the allegations contained in Paragraph 51 of the Complaint.

52. DENY the truth of the allegations contained in Paragraph 52 of the Complaint and respectfully refers the Court to the Complaint for its full form and content.

53. DENY the truth of the allegations contained in Paragraph 53 of the Complaint.

54. DENY the truth of the allegations contained in Paragraph 54 of the Complaint.

55. DENY the truth of the allegations contained in Paragraph 55 of the Complaint.

56. DENY the truth of the allegations contained in Paragraph 56 of the Complaint.

57. DENY the truth of the allegations contained in Paragraph 57 (a) – (h) of the Complaint.

58. DENY the truth of the allegations contained in Paragraph 58 of the Complaint.

59. DENY the truth of the allegations contained in Paragraph 59 of the Complaint and respectfully refers the Court to the Complaint for its full form and content.

60. DENY the truth of the allegations contained in Paragraph 60 of the Complaint.

61. DENY the truth of the allegations contained in Paragraph 61 of the Complaint.

62. DENY the truth of the allegations contained in Paragraph 62 of the Complaint.

63. DENY the truth of the allegations contained in Paragraph 63 of the Complaint.

64. DENY the truth of the allegations contained in Paragraph 64 (a) – (f) of the Complaint.

65. DENY the truth of the allegations contained in Paragraph 65 of the Complaint.

66. DENY the truth of the allegations contained in Paragraph 66 of the Complaint and respectfully refers the Court to the Complaint for its full form and content.

67. DENY the truth of the allegations contained in Paragraph 67 of the Complaint.

68. DENY the truth of the allegations contained in Paragraph 68 of the Complaint.

69. DENY the truth of the allegations contained in Paragraph 69 of the Complaint.

70. DENY the truth of the allegations contained in Paragraph 70 of the Complaint.

71. DENY the truth of the allegations contained in Paragraph 71 (a) – (d) of the Complaint.

72. DENY the truth of the allegations contained in Paragraph 72 of the Complaint.

73. DENY the truth of the allegations contained in Paragraph 73 of the Complaint and respectfully refers the Court to the Complaint for its full form and content.

74. DENY the truth of the allegations contained in Paragraph 74 of the Complaint.

75. DENY the truth of the allegations contained in Paragraph 75 of the Complaint.

76. DENY the truth of the allegations contained in Paragraph 76 of the Complaint.

77. DENY the truth of the allegations contained in Paragraph 77 of the Complaint.

78. DENY the truth of the allegations contained in Paragraph 78 (a) – (n) of the Complaint.

79. DENY the truth of the allegations contained in Paragraph 79 of the Complaint.

80. ADMIT the truth of the allegations contained in Paragraph 80 of the Complaint.

81. ADMIT the truth of the allegations contained in Paragraph 81 of the Complaint.

82. DENY the truth of the allegations contained in Paragraph 82 of the Complaint.

83. DENY the truth of the allegations contained in Paragraph 83 of the Complaint.

84. DENY the truth of the allegations contained in Paragraph 84 of the Complaint.

85. DENY the truth of the allegations contained in Paragraph 85 of the Complaint.

86. DENY the truth of the allegations contained in Paragraph 86 of the Complaint.

87. DENY the truth of the allegations contained in Paragraph 87 of the Complaint.

88. DENY the truth of the allegations contained in Paragraph 88 of the Complaint.

89. DENY the truth of the allegations contained in Paragraph 89 the Complaint.

90. DENY the truth of the allegations contained in Paragraph 90 of the Complaint.

91. ADMIT the truth of the allegations contained in Paragraph 91 of the Complaint.

92. DENY the truth of the allegations contained in Paragraph 92 of the Complaint.

93. DENY the truth of the allegations contained in Paragraph 93 of the Complaint.

94. DENY the truth of the allegations contained in Paragraph 94 of the Complaint.

95. DENY the truth of the allegations contained in Paragraph 95 of the Complaint.

96. DENY the truth of the allegations contained in Paragraph 96 of the Complaint.

97. DENY the truth of the allegations contained in Paragraph 97 of the Complaint.

98. DENY the truth of the allegations contained in Paragraph 98 of the Complaint.

99. DENY the truth of the allegations contained in Paragraph 99 of the Complaint.

100. DENY the truth of the allegations contained in Paragraph 100 of the Complaint.

101. DENY the truth of the allegations contained in Paragraph 101 of the Complaint.

102. DENY the truth of the allegations contained in Paragraph 102 of the Complaint.

103. DENY the truth of the allegations contained in Paragraph 103 of the Complaint.

104. DENY the truth of the allegations contained in Paragraph 104 of the Complaint.

105. DENY the truth of the allegations contained in Paragraph 105 of the Complaint.

106. DENY the truth of the allegations contained in Paragraph 106 of the Complaint.

107. DENY the truth of the allegations contained in Paragraph 107 of the Complaint.

108. DENY the truth of the allegations contained in Paragraph 108 of the Complaint.

109. DENY the truth of the allegations contained in Paragraph 109 of the Complaint.

110. DENY the truth of the allegations contained in Paragraph 110 of the Complaint.

111. ADMIT the truth of the allegations contained in Paragraph 111 of the Complaint.

112. DENY the truth of the allegations contained in Paragraph 112 of the Complaint.

113. DENY the truth of the allegations contained in Paragraph 113 of the Complaint.

114. DENY the truth of the allegations contained in Paragraph 114 of the Complaint.

115. DENY the truth of the allegations contained in Paragraph 115 of the Complaint.

116. DENY the truth of the allegations contained in Paragraph 116 of the Complaint.

117. DENY the truth of the allegations contained in Paragraph 117 of the Complaint.

118. DENY the truth of the allegations contained in Paragraph 118 of the Complaint.

119. ADMIT the truth of the allegations contained in Paragraph 119 of the Complaint.

120. DENY the truth of the allegations contained in Paragraph 120 of the Complaint.

121. DENY the truth of the allegations contained in Paragraph 121 of the Complaint.

122. DENY the truth of the allegations contained in Paragraph 122 of the Complaint.

123. DENY the truth of the allegations contained in Paragraph 123 of the Complaint.

124. DENY the truth of the allegations contained in Paragraph 124 of the Complaint.

125. DENY the truth of the allegations contained in Paragraph 125 of the Complaint.

126. DENY the truth of the allegations contained in Paragraph 126 of the Complaint.

127. DENY the truth of the allegations contained in Paragraph 127 of the Complaint.

128. DENY the truth of the allegations contained in Paragraph 128 of the Complaint.

129. ADMIT the truth of the allegations contained in Paragraph 129 of the Complaint.

130. DENY the truth of the allegations contained in Paragraph 130 of the Complaint.

131. DENY the truth of the allegations contained in Paragraph 131 of the Complaint.

132. DENY the truth of the allegations contained in Paragraph 132 of the Complaint.

133. DENY the truth of the allegations contained in Paragraph 133 of the Complaint.

134. DENY the truth of the allegations contained in Paragraph 134 of the Complaint.

135. DENY the truth of the allegations contained in Paragraph 135 of the Complaint.

136. DENY the truth of the allegations contained in Paragraph 136 of the Complaint.

137. DENY the truth of the allegations contained in Paragraph 137 of the Complaint.

138. DENY the truth of the allegations contained in Paragraph 138 of the Complaint.

139. DENY the truth of the allegations contained in Paragraph 139 of the Complaint.

140. DENY the truth of the allegations contained in Paragraph 140 of the Complaint.

141. DENY the truth of the allegations contained in Paragraph 141 of the Complaint.

142. DENY the truth of the allegations contained in Paragraph 142 of the Complaint.

143. DENY the truth of the allegations contained in Paragraph 143 of the Complaint.

144. DENY the truth of the allegations contained in Paragraph 144 of the Complaint.

145. DENY the truth of the allegations contained in Paragraph 145 of the Complaint.

146. DENY the truth of the allegations contained in Paragraph 146 of the Complaint.

147. DENY the truth of the allegations contained in Paragraph 147 of the Complaint.

148. DENY the truth of the allegations contained in Paragraph 148 of the Complaint.

149. DENY the truth of the allegations contained in Paragraph 149 of the Complaint.

150. DENY the truth of the allegations contained in Paragraph 150 of the Complaint.

151. DENY the truth of the allegations contained in Paragraph 151 of the Complaint.

152. DENY the truth of the allegations contained in Paragraph 152 of the Complaint.

153. DENY the truth of the allegations contained in Paragraph 153 of the Complaint.

154. DENY the truth of the allegations contained in Paragraph 154 of the Complaint.

155. DENY the truth of the allegations contained in Paragraph 155 of the Complaint.

156. DENY the truth of the allegations contained in Paragraph 156 of the Complaint.

157. DENY the truth of the allegations contained in Paragraph 157 of the Complaint except ADMIT Ms. LaCava was terminated in or around August 2012 and did not receive any severance payment.

158. DENY the truth of the allegations contained in Paragraph 158 of the Complaint.

159. DENY the truth of the allegations contained in Paragraph 159 of the Complaint.

160. DENY the truth of the allegations contained in Paragraph 160 of the Complaint.

161. DENY the truth of the allegations contained in Paragraph 161 of the Complaint.

162. DENY the truth of the allegations contained in Paragraph 162 of the Complaint.

163. DENY the truth of the allegations contained in Paragraph 163 of the Complaint.

164. DENY the truth of the allegations contained in Paragraph 164 of the Complaint.

165. DENY the truth of the allegations contained in Paragraph 165 of the Complaint.

166. ADMIT the truth of the allegations contained in Paragraph 166 of the Complaint.

167. DENY the truth of the allegations contained in Paragraph 167 of the Complaint.

168. DENY the truth of the allegations contained in Paragraph 168 of the Complaint.

169. DENY the truth of the allegations contained in Paragraph 169 of the Complaint.

170. DENY the truth of the allegations contained in Paragraph 170 of the Complaint.

171. DENY the truth of the allegations contained in Paragraph 171 of the Complaint.

172. DENY the truth of the allegations contained in Paragraph 172 of the Complaint.

173. DENY the truth of the allegations contained in Paragraph 173 of the Complaint.

174. DENY the truth of the allegations contained in Paragraph 174 of the Complaint.

175. DENY the truth of the allegations contained in Paragraph 175 of the Complaint.

176. DENY the truth of the allegations contained in Paragraph 176 of the Complaint.

177. DENY the truth of the allegations contained in Paragraph 177 of the Complaint.

178. DENY the truth of the allegations contained in Paragraph 178 of the Complaint.

179. DENY the truth of the allegations contained in Paragraph 179 of the Complaint.

180. DENY the truth of the allegations contained in Paragraph 180 of the Complaint.

181. DENY the truth of the allegations contained in Paragraph 181 of the Complaint.

182. DENY the truth of the allegations contained in Paragraph 182 of the Complaint.

183. DENY the truth of the allegations contained in Paragraph 183 of the Complaint.

184. DENY the truth of the allegations contained in Paragraph 184 of the Complaint.

185. DENY the truth of the allegations contained in Paragraph 185 of the Complaint.

186. DENY the truth of the allegations contained in Paragraph 186 of the Complaint.

187. DENY the truth of the allegations contained in Paragraph 187 of the Complaint except ADMIT Ms. LaCava was not paid premium overtime compensation for work in excess of 40 per week.

188. DENY the truth of the allegations contained in Paragraph 188 of the Complaint.

189. ADMIT the truth of the allegations contained in Paragraph 189 of the Complaint.

190. DENY the truth of the allegations contained in Paragraph 190 of the Complaint.

191. DENY the truth of the allegations contained in Paragraph 191 of the Complaint.

192. DENY the truth of the allegations contained in Paragraph 192 of the Complaint.

193. DENY the truth of the allegations contained in Paragraph 193 of the Complaint.

194. DENY the truth of the allegations contained in Paragraph 194 of the Complaint.

195. DENY the truth of the allegations contained in Paragraph 195 of the Complaint.

196. DENY the truth of the allegations contained in Paragraph 196 of the Complaint.

197. DENY the truth of the allegations contained in Paragraph 197 of the Complaint.

198. DENY the truth of the allegations contained in Paragraph 198 of the Complaint.

199. DENY the truth of the allegations contained in Paragraph 199 of the Complaint.

200. ADMIT the truth of the allegations contained in Paragraph 200 of the Complaint.

201. DENY the truth of the allegations contained in Paragraph 201 of the Complaint.

202. DENY the truth of the allegations contained in Paragraph 202 of the Complaint.

203. DENY the truth of the allegations contained in Paragraph 203 of the Complaint.

204. DENY the truth of the allegations contained in Paragraph 204 of the Complaint.

205. DENY the truth of the allegations contained in Paragraph 205 of the Complaint.

206. DENY the truth of the allegations contained in Paragraph 206 of the Complaint.

207. DENY the truth of the allegations contained in Paragraph 207 of the Complaint.

208. DENY the truth of the allegations contained in Paragraph 208 of the Complaint.

209. DENY the truth of the allegations contained in Paragraph 209 of the Complaint.

210. DENY the truth of the allegations contained in Paragraph 210 of the Complaint.

211. DENY the truth of the allegations contained in Paragraph 211 of the Complaint.

212. DENY the truth of the allegations contained in Paragraph 212 of the Complaint.

213. DENY the truth of the allegations contained in Paragraph 213 of the Complaint.

214. DENY the truth of the allegations contained in Paragraph 214 of the Complaint.

215. DENY the truth of the allegations contained in Paragraph 215 of the Complaint.

216. DENY the truth of the allegations contained in Paragraph 216 of the Complaint.

217. DENY the truth of the allegations contained in Paragraph 217 of the Complaint.

218. DENY the truth of the allegations contained in Paragraph 218 of the Complaint.

219. DENY the truth of the allegations contained in Paragraph 219 of the Complaint.

220. DENY the truth of the allegations contained in Paragraph 220 of the Complaint.

221. DENY the truth of the allegations contained in Paragraph 221 of the Complaint.

222. DENY the truth of the allegations contained in Paragraph 222 of the Complaint.

223. DENY the truth of the allegations contained in Paragraph 223 of the Complaint.

224. DENY the truth of the allegations contained in Paragraph 224 of the Complaint.

225. DENY the truth of the allegations contained in Paragraph 225 of the Complaint.

226. DENY the truth of the allegations contained in Paragraph 226 of the Complaint.

227. DENY the truth of the allegations contained in Paragraph 227 of the Complaint.

228. DENY the truth of the allegations contained in Paragraph 228 of the Complaint.

229. DENY the truth of the allegations contained in Paragraph 229 of the Complaint.

230. DENY the truth of the allegations contained in Paragraph 230 of the Complaint.

231. DENY the truth of the allegations contained in Paragraph 231 of the Complaint.

232. DENY the truth of the allegations contained in Paragraph 232 of the Complaint.

233. DENY the truth of the allegations contained in Paragraph 233 of the Complaint.

234. DENY the truth of the allegations contained in Paragraph 234 of the Complaint.

235. DENY the truth of the allegations contained in Paragraph 235 of the Complaint.

236. ADMIT the truth of the allegations contained in Paragraph 236 of the Complaint.

237. DENY the truth of the allegations contained in Paragraph 237 of the Complaint.

238. DENY the truth of the allegations contained in Paragraph 238 of the Complaint.

239. DENY the truth of the allegations contained in Paragraph 239 of the Complaint.

240. DENY the truth of the allegations contained in Paragraph 240 of the Complaint.

241. DENY the truth of the allegations contained in Paragraph 241 of the Complaint.

242. DENY the truth of the allegations contained in Paragraph 242 of the Complaint.

243. DENY the truth of the allegations contained in Paragraph 243 of the Complaint.

244. DENY the truth of the allegations contained in Paragraph 244 of the Complaint.

245. DENY the truth of the allegations contained in Paragraph 245 of the Complaint.

246. DENY the truth of the allegations contained in Paragraph 246 of the Complaint.

247. DENY the truth of the allegations contained in Paragraph 247 of the Complaint.

248. DENY the truth of the allegations contained in Paragraph 248 of the Complaint.

249. DENY the truth of the allegations contained in Paragraph 249 of the Complaint.

250. ADMIT the truth of the allegations contained in Paragraph 250 of the Complaint.

251. DENY the truth of the allegations contained in Paragraph 251 of the Complaint.

252. DENY the truth of the allegations contained in Paragraph 252 of the Complaint.

253. DENY the truth of the allegations contained in Paragraph 253 of the Complaint.

254. DENY the truth of the allegations contained in Paragraph 254 of the Complaint.

255. DENY the truth of the allegations contained in Paragraph 255 of the Complaint.

256. DENY the truth of the allegations contained in Paragraph 256 of the Complaint.

257. DENY the truth of the allegations contained in Paragraph 257 of the Complaint except ADMIT Mr. Conroy was not paid premium overtime compensation for hours worked in excess of 40 per week.

258. ADMIT the truth of the allegations contained in Paragraph 258 of the Complaint.

259. ADMIT the truth of the allegations contained in Paragraph 259 of the Complaint.

260. DENY the truth of the allegations contained in Paragraph 260 of the Complaint.

261. DENY the truth of the allegations contained in Paragraph 261 of the Complaint.

262. DENY the truth of the allegations contained in Paragraph 262 of the Complaint.

263. DENY the truth of the allegations contained in Paragraph 263 of the Complaint.

264. DENY the truth of the allegations contained in Paragraph 264 of the Complaint.

265. DENY the truth of the allegations contained in Paragraph 265 of the Complaint.

266. DENY the truth of the allegations contained in Paragraph 266 of the Complaint.

267. DENY the truth of the allegations contained in Paragraph 267 of the Complaint.

268. DENY the truth of the allegations contained in Paragraph 268 of the Complaint.

269. DENY the truth of the allegations contained in Paragraph 269 of the Complaint.

270. ADMIT the truth of the allegations contained in Paragraph 270 of the Complaint.

271. DENY the truth of the allegations contained in Paragraph 271 of the Complaint.

272. DENY the truth of the allegations contained in Paragraph 272 of the Complaint.

273. DENY the truth of the allegations contained in Paragraph 273 of the Complaint.

274. DENY the truth of the allegations contained in Paragraph 274 of the Complaint.

275. DENY the truth of the allegations contained in Paragraph 275 of the Complaint.

276. DENY the truth of the allegations contained in Paragraph 276 of the Complaint.

277. DENY the truth of the allegations contained in Paragraph 277 of the Complaint.

278. DENY the truth of the allegations contained in Paragraph 278 of the Complaint.

279. DENY the truth of the allegations contained in Paragraph 279 of the Complaint.

280. DENY the truth of the allegations contained in Paragraph 280 of the Complaint.

281. DENY the truth of the allegations contained in Paragraph 281 of the Complaint.

282. DENY the truth of the allegations contained in Paragraph 282 of the Complaint.

283. DENY the truth of the allegations contained in Paragraph 283 of the Complaint.

284. DENY the truth of the allegations contained in Paragraph 284 of the Complaint.

285. DENY the truth of the allegations contained in Paragraph 285 of the Complaint.

286. DENY the truth of the allegations contained in Paragraph 286 of the Complaint.

287. DENY the truth of the allegations contained in Paragraph 287 of the Complaint.

288. DENY the truth of the allegations contained in Paragraph 288 of the Complaint.

289. DENY the truth of the allegations contained in Paragraph 289 of the Complaint.

290. DENY the truth of the allegations contained in Paragraph 290 of the Complaint.

291. DENY the truth of the allegations contained in Paragraph 291 of the Complaint.

292. DENY the truth of the allegations contained in Paragraph 292 of the Complaint.

293. DENY the truth of the allegations contained in Paragraph 293 of the Complaint.

294. DENY the truth of the allegations contained in Paragraph 294 of the Complaint.

295. DENY the truth of the allegations contained in Paragraph 295 of the Complaint.

296. DENY the truth of the allegations contained in Paragraph 296 of the Complaint.

297. DENY the truth of the allegations contained in Paragraph 297 of the Complaint.

298. DENY information and knowledge sufficient to form a belief as to the truth of the allegations contained in paragraph 298 of the Complaint.

299. DENY the truth of the allegations contained in Paragraph 299 of the Complaint.

300. DENY the truth of the allegations contained in Paragraph 300 of the Complaint.

301. DENY the truth of the allegations contained in Paragraph 301 of the Complaint.

302. DENY the truth of the allegations contained in Paragraph 302 of the Complaint.

303. DENY the truth of the allegations contained in Paragraph 303 of the Complaint.

304. DENY the truth of the allegations contained in Paragraph 304 of the Complaint.

305. DENY the truth of the allegations contained in Paragraph 305 of the Complaint.

306. DENY the truth of the allegations contained in Paragraph 306 of the Complaint.

307. DENY the truth of the allegations contained in Paragraph 307 of the Complaint.

308. DENY the truth of the allegations contained in Paragraph 308 of the Complaint.

309. DENY the truth of the allegations contained in Paragraph 309 of the Complaint.

310. DENY the truth of the allegations contained in Paragraph 310 of the Complaint.

311. DENY the truth of the allegations contained in Paragraph 311 of the Complaint.

312. DENY the truth of the allegations contained in Paragraph 312 of the Complaint.

313. DENY the truth of the allegations contained in Paragraph 313 of the Complaint.

314. DENY the truth of the allegations contained in Paragraph 314 of the Complaint.

315. ADMIT the truth of the allegations contained in Paragraph 315 of the Complaint.

316. DENY the truth of the allegations contained in Paragraph 316 of the Complaint.

317. DENY the truth of the allegations contained in Paragraph 317 of the Complaint.

318. DENY the truth of the allegations contained in Paragraph 318 of the Complaint.

319. DENY the truth of the allegations contained in Paragraph 319 of the Complaint.

320. DENY the truth of the allegations contained in Paragraph 320 of the Complaint.

321. DENY the truth of the allegations contained in Paragraph 321 of the Complaint.

322. DENY the truth of the allegations contained in Paragraph 322 of the Complaint except ADMIT Mr. Cresti was not paid premium overtime compensation for hours worked in excess of 40 per week.

323. DENY the truth of the allegations contained in Paragraph 323 of the Complaint.

324. ADMIT the truth of the allegations contained in Paragraph 324 of the Complaint.

325. DENY the truth of the allegations contained in Paragraph 325 of the Complaint.

326. DENY the truth of the allegations contained in Paragraph 326 of the Complaint.

327. DENY the truth of the allegations contained in Paragraph 327 of the Complaint.

328. DENY the truth of the allegations contained in Paragraph 328 of the Complaint.

329. DENY the truth of the allegations contained in Paragraph 329 of the Complaint.

330. DENY the truth of the allegations contained in Paragraph 330 of the Complaint.

331. DENY the truth of the allegations contained in Paragraph 331 of the Complaint.

332. DENY information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 332 of the Complaint.

333. DENY the truth of the allegations contained in Paragraph 333 of the Complaint.

334. DENY the truth of the allegations contained in Paragraph 334 of the Complaint.

335. DENY the truth of the allegations contained in Paragraph 335 of the Complaint.

336. DENY the truth of the allegations contained in Paragraph 336 of the Complaint.

337. DENY the truth of the allegations contained in Paragraph 337 of the Complaint.

338. DENY the truth of the allegations contained in Paragraph 338 of the Complaint.

339. DENY the truth of the allegations contained in Paragraph 339 of the Complaint.

340. DENY the truth of the allegations contained in Paragraph 340 of the Complaint.

341. DENY the truth of the allegations contained in Paragraph 341 of the Complaint.

342. DENY the truth of the allegations contained in Paragraph 342 of the Complaint.

343. DENY the truth of the allegations contained in Paragraph 343 of the Complaint.

344. DENY the truth of the allegations contained in Paragraph 344 of the Complaint.

345. DENY the truth of the allegations contained in Paragraph 345 of the Complaint.

346. DENY the truth of the allegations contained in Paragraph 345 of the Complaint except ADMIT Mr. Hawkins was not paid premium overtime compensation for hours worked over 40 per week.

347. ADMIT the truth of the allegations contained in Paragraph 347 of the Complaint.

348. ADMIT the truth of the allegations contained in Paragraph 348 of the Complaint.

349. DENY the truth of the allegations contained in Paragraph 349 of the Complaint.

350. DENY the truth of the allegations contained in Paragraph 350 of the Complaint.

351. DENY the truth of the allegations contained in Paragraph 351 of the Complaint.

352. DENY the truth of the allegations contained in Paragraph 352 of the Complaint.

353. DENY the truth of the allegations contained in Paragraph 353 of the Complaint.

354. DENY the truth of the allegations contained in Paragraph 354 of the Complaint.

355. DENY the truth of the allegations contained in Paragraph 355 of the Complaint.

356. DENY the truth of the allegations contained in Paragraph 356 of the Complaint.

357. DENY the truth of the allegations contained in Paragraph 357 of the Complaint.

358. ADMIT the truth of the allegations contained in Paragraph 358 of the Complaint.

359. DENY the truth of the allegations contained in Paragraph 359 of the Complaint.

360. DENY the truth of the allegations contained in Paragraph 360 of the Complaint.

361. DENY the truth of the allegations contained in Paragraph 361 of the Complaint.

362. DENY the truth of the allegations contained in Paragraph 362 of the Complaint.

363. DENY the truth of the allegations contained in Paragraph 363 of the Complaint.

364. DENY the truth of the allegations contained in Paragraph 364 of the Complaint.

365. DENY the truth of the allegations contained in Paragraph 365 of the Complaint.

366. DENY the truth of the allegations contained in Paragraph 366 of the Complaint.

367. DENY the truth of the allegations contained in Paragraph 367 of the Complaint.

368. DENY the truth of the allegations contained in Paragraph 368 of the Complaint.

369. DENY the truth of the allegations contained in Paragraph 369 of the Complaint.

370. DENY the truth of the allegations contained in Paragraph 370 of the Complaint.

371. DENY the truth of the allegations contained in Paragraph 371 of the Complaint.

372. DENY the truth of the allegations contained in Paragraph 372 of the Complaint.

373. DENY the truth of the allegations contained in Paragraph 373 of the Complaint.

374. DENY the truth of the allegations contained in Paragraph 374 of the Complaint.

375. DENY the truth of the allegations contained in Paragraph 375 of the Complaint.

376. DENY the truth of the allegations contained in Paragraph 376 of the Complaint.

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378. DENY the truth of the allegations contained in Paragraph 378 of the Complaint.

379. DENY the truth of the allegations contained in Paragraph 379 of the Complaint.

380. DENY the truth of the allegations contained in Paragraph 380 of the Complaint.

381. DENY the truth of the allegations contained in Paragraph 381 of the Complaint.

382. ADMIT the truth of the allegations contained in Paragraph 382 of the Complaint.

383. DENY the truth of the allegations contained in Paragraph 383 of the Complaint.

384. DENY the truth of the allegations contained in Paragraph 384 of the Complaint.

385. DENY the truth of the allegations contained in Paragraph 385 of the Complaint.

386. DENY the truth of the allegations contained in Paragraph 386 of the Complaint.

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388. DENY the truth of the allegations contained in Paragraph 388 of the Complaint.

389. DENY the truth of the allegations contained in Paragraph 389 of the Complaint.

390. DENY the truth of the allegations contained in Paragraph 390 of the Complaint.

391. DENY the truth of the allegations contained in Paragraph 391 of the Complaint.

392. DENY the truth of the allegations contained in Paragraph 392 of the Complaint.

393. DENY the truth of the allegations contained in Paragraph 393 of the Complaint.

394. DENY the truth of the allegations contained in Paragraph 394 of the Complaint.

395. DENY the truth of the allegations contained in Paragraph 395 of the Complaint.

396. ADMIT the truth of the allegations contained in Paragraph 396 of the Complaint.

397. DENY the truth of the allegations contained in Paragraph 397 of the Complaint.

398. DENY the truth of the allegations contained in Paragraph 398 of the Complaint.

399. DENY the truth of the allegations contained in Paragraph 399 of the Complaint.

400. DENY the truth of the allegations contained in Paragraph 400 of the Complaint.

401. DENY the truth of the allegations contained in Paragraph 401 of the Complaint.

402. DENY the truth of the allegations contained in Paragraph 402 of the Complaint.

403. DENY the truth of the allegations contained in Paragraph 403 of the Complaint except ADMIT that Ms. Ilagan was not paid premium overtime compensation for hours worked in excess of 40 per week.

404. ADMIT the truth of the allegations contained in Paragraph 404 of the Complaint.

405. DENY the truth of the allegations contained in Paragraph 405 of the Complaint.

406. DENY the truth of the allegations contained in Paragraph 406 of the Complaint.

407. DENY the truth of the allegations contained in Paragraph 407 of the Complaint.

408. DENY the truth of the allegations contained in Paragraph 408 of the Complaint.

409. DENY the truth of the allegations contained in Paragraph 409 of the Complaint.

410. DENY the truth of the allegations contained in Paragraph 410 of the Complaint.

411. DENY the truth of the allegations contained in Paragraph 411 of the Complaint.

412. DENY the truth of the allegations contained in Paragraph 412 of the Complaint.

413. DENY the truth of the allegations contained in Paragraph 413 of the Complaint.

414. ADMIT the truth of the allegations contained in Paragraph 414 of the Complaint.

415. DENY the truth of the allegations contained in Paragraph 415 of the Complaint.

416. DENY the truth of the allegations contained in Paragraph 416 of the Complaint.

417. DENY the truth of the allegations contained in Paragraph 417 of the Complaint.

418. DENY the truth of the allegations contained in Paragraph 418 of the Complaint.

419. DENY the truth of the allegations contained in paragraph 419 of the Complaint.

420. DENY the truth of the allegations contained in Paragraph 420 of the Complaint.

421. DENY the truth of the allegations contained in Paragraph 421 of the Complaint.

422. DENY the truth of the allegations contained in Paragraph 422 of the Complaint.

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433. DENY the truth of the allegations contained in Paragraph 433 of the Complaint.

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436. DENY the truth of the allegations contained in Paragraph 436 of the Complaint.

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438. DENY the truth of the allegations contained in Paragraph 438 of the Complaint.

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449. DENY the truth of the allegations contained in Paragraph 449 of the Complaint.

450. DENY the truth of the allegations contained in Paragraph 450 of the Complaint.

451. DENY the truth of the allegations contained in Paragraph 451 of the Complaint.

452. ADMIT the truth of the allegations contained in Paragraph 452 of the Complaint.

453. DENY the truth of the allegations contained in Paragraph 453 of the Complaint.

454. DENY the truth of the allegations contained in Paragraph 454 of the Complaint.

455. DENY the truth of the allegations contained in Paragraph 455 of the Complaint.

456. DENY the truth of the allegations contained in Paragraph 456 of the Complaint.

457. DENY the truth of the allegations contained in Paragraph 457 of the Complaint.

458. DENY the truth of the allegations contained in Paragraph 458 of the Complaint.

459. DENY the truth of the allegations contained in Paragraph 459 of the Complaint.

460. ADMIT the truth of the allegations contained in Paragraph 460 of the Complaint.

461. DENY the truth of the allegations contained in Paragraph 461 of the Complaint.

462. DENY the truth of the allegations contained in Paragraph 462 of the Complaint.

463. DENY the truth of the allegations contained in Paragraph 463 of the Complaint.

464. DENY the truth of the allegations contained in Paragraph 464 of the Complaint.

465. DENY the truth of the allegations contained in Paragraph 465 of the Complaint.

466. DENY the truth of the allegations contained in Paragraph 466 of the Complaint.

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469. DENY the truth of the allegations contained in Paragraph 469 of the Complaint.

470. DENY the truth of the allegations contained in Paragraph 470 of the Complaint.

471. DENY the truth of the allegations contained in Paragraph 471 of the Complaint.

472. DENY the truth of the allegations contained in Paragraph 472 of the Complaint.

473. DENY the truth of the allegations contained in Paragraph 473 of the Complaint.

474. DENY the truth of the allegations contained in Paragraph 474 of the Complaint except ADMIT Mr. Klein was not paid premium overtime compensation for hours worked in excess of 40 per week.

475. DENY the truth of the allegations contained in Paragraph 475 of the Complaint.

476. ADMIT the truth of the allegations contained in Paragraph 476 of the Complaint.

477. DENY the truth of the allegations contained in Paragraph 477 of the Complaint.

478. DENY the truth of the allegations contained in Paragraph 478 of the Complaint.

479. DENY the truth of the allegations contained in Paragraph 479 of the Complaint.

480. DENY the truth of the allegations contained in Paragraph 480 of the Complaint.

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482. DENY the truth of the allegations contained in Paragraph 482 of the Complaint.

483. DENY the truth of the allegations contained in Paragraph 483 of the Complaint.

484. DENY the truth of the allegations contained in Paragraph 484 of the Complaint.

485. ADMIT the truth of the allegations contained in Paragraph 485 of the Complaint.

486. DENY the truth of the allegations contained in Paragraph 486 of the Complaint.

487. DENY the truth of the allegations contained in Paragraph 487 of the Complaint.

488. DENY the truth of the allegations contained in Paragraph 488 of the Complaint.

489. DENY the truth of the allegations contained in Paragraph 489 of the Complaint.

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500. DENY the truth of the allegations contained in Paragraph 500 of the Complaint.

501. DENY the truth of the allegations contained in Paragraph 501 of the Complaint.

502. DENY the truth of the allegations contained in Paragraph 502 of the Complaint.

503. DENY the truth of the allegations contained in Paragraph 503 of the Complaint.

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506. DENY the truth of the allegations contained in Paragraph 506 of the Complaint.

507. DENY the truth of the allegations contained in Paragraph 507 of the Complaint.

508. DENY the truth of the allegations contained in Paragraph 508 of the Complaint.

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511. DENY the truth of the allegations contained in Paragraph 511 of the Complaint.

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513. DENY the truth of the allegations contained in Paragraph 513 of the Complaint.

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515. DENY the truth of the allegations contained in Paragraph 515 of the Complaint.

516. DENY the truth of the allegations contained in Paragraph 516 of the Complaint.

517. DENY the truth of the allegations contained in Paragraph 517 of the Complaint.

518. DENY the truth of the allegations contained in Paragraph 518 of the Complaint.

519. DENY the truth of the allegations contained in Paragraph 519 of the Complaint.

520. DENY the truth of the allegations contained in Paragraph 520 of the Complaint.

521. DENY the truth of the allegations contained in Paragraph 521 of the Complaint.

522. ADMIT the truth of the allegations contained in Paragraph 522 of the Complaint.

523. DENY the truth of the allegations contained in Paragraph 523 of the Complaint.

524. DENY the truth of the allegations contained in Paragraph 524 of the Complaint.

525. DENY the truth of the allegations contained in Paragraph 525 of the Complaint.

526. DENY the truth of the allegations contained in Paragraph 526 of the Complaint.

527. DENY the truth of the allegations contained in Paragraph 527 of the Complaint.

528. DENY the truth of the allegations contained in Paragraph 528 of the Complaint.

529. DENY the truth of the allegations contained in Paragraph 529 of the Complaint.

530. DENY the truth of the allegations contained in Paragraph 530 of the Complaint.

531. DENY the truth of the allegations contained in Paragraph 531 of the Complaint.

532. DENY the truth of the allegations contained in Paragraph 532 of the Complaint.

533. DENY the truth of the allegations contained in Paragraph 533 of the Complaint.

534. DENY the truth of the allegations contained in Paragraph 534 of the Complaint.

535. DENY the truth of the allegations contained in Paragraph 535 of the Complaint.

536. DENY the truth of the allegations contained in Paragraph 536 of the Complaint.

537. DENY the truth of the allegations contained in Paragraph 537 of the Complaint.

538. DENY the truth of the allegations contained in Paragraph 538 of the Complaint.

539. DENY the truth of the allegations contained in Paragraph 539 of the Complaint.

540. DENY the truth of the allegations contained in Paragraph 540 of the Complaint.

541. DENY the truth of the allegations contained in Paragraph 541 of the Complaint.

542. DENY the truth of the allegations contained in Paragraph 542 of the Complaint except ADMIT that Mr. Kvint was not paid premium overtime compensation for hours worked in excess of 40 per week.

543. ADMIT the truth of the allegations contained in Paragraph 543 of the Complaint.

544. ADMIT the truth of the allegations contained in Paragraph 544 of the Complaint.

545. DENY the truth of the allegations contained in Paragraph 545 of the Complaint.

546. DENY the truth of the allegations contained in Paragraph 546 of the Complaint.

547. DENY the truth of the allegations contained in Paragraph 547 of the Complaint.

548. DENY the truth of the allegations contained in Paragraph 548 of the Complaint.

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550. DENY the truth of the allegations contained in Paragraph 550 of the Complaint.

551. DENY the truth of the allegations contained in Paragraph 551 of the Complaint.

552. DENY the truth of the allegations contained in Paragraph 552 of the Complaint.

553. DENY the truth of the allegations contained in Paragraph 553 of the Complaint.

554. ADMIT the truth of the allegations contained in Paragraph 554 of the Complaint.

555. DENY the truth of the allegations contained in Paragraph 555 of the Complaint.

556. DENY the truth of the allegations contained in Paragraph 556 of the Complaint.

557. DENY the truth of the allegations contained in Paragraph 557 of the Complaint.

558. DENY the truth of the allegations contained in Paragraph 558 of the Complaint.

559. DENY the truth of the allegations contained in Paragraph 559 of the Complaint.

560. DENY the truth of the allegations contained in Paragraph 560 of the Complaint.

561. DENY the truth of the allegations contained in Paragraph 561 of the Complaint.

562. DENY the truth of the allegations contained in Paragraph 562 of the Complaint.

563. DENY the truth of the allegations contained in Paragraph 563 of the Complaint.

564. DENY the truth of the allegations contained in Paragraph 564 of the Complaint.

565. DENY the truth of the allegations contained in Paragraph 565 of the Complaint.

566. DENY the truth of the allegations contained in Paragraph 566 of the Complaint.

567. DENY the truth of the allegations contained in Paragraph 567 of the Complaint.

568. DENY the truth of the allegations contained in Paragraph 568 of the Complaint.

569. DENY the truth of the allegations contained in Paragraph 569 of the Complaint.

570. DENY the truth of the allegations contained in Paragraph 570 of the Complaint.

571. DENY the truth of the allegations contained in Paragraph 571 of the Complaint.

572. DENY the truth of the allegations contained in Paragraph 572 of the Complaint.

573. DENY the truth of the allegations contained in Paragraph 573 of the Complaint.

574. DENY the truth of the allegations contained in Paragraph 574 of the Complaint.

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577. DENY the truth of the allegations contained in Paragraph 577 of the Complaint.

578. DENY the truth of the allegations contained in Paragraph 578 of the Complaint.

579. DENY the truth of the allegations contained in Paragraph 579 of the Complaint.

580. DENY the truth of the allegations contained in Paragraph 580 of the Complaint.

581. DENY the truth of the allegations contained in Paragraph 581 of the Complaint.

582. DENY the truth of the allegations contained in Paragraph 582 of the Complaint.

583. DENY the truth of the allegations contained in Paragraph 583 of the Complaint.

584. DENY the truth of the allegations contained in Paragraph 584 of the Complaint.

585. DENY the truth of the allegations contained in Paragraph 585 of the Complaint.

586. DENY the truth of the allegations contained in Paragraph 586 of the Complaint.

587. DENY the truth of the allegations contained in Paragraph 587 of the Complaint.

588. DENY the truth of the allegations contained in Paragraph 588 of the Complaint.

589. DENY the truth of the allegations contained in Paragraph 589 of the Complaint.

590. DENY the truth of the allegations contained in Paragraph 590 of the Complaint.

591. ADMIT the truth of the allegations contained in Paragraph 591 of the Complaint.

592. DENY the truth of the allegations contained in Paragraph 592 of the Complaint.

593. DENY the truth of the allegations contained in Paragraph 593 of the Complaint.

594. DENY the truth of the allegations contained in Paragraph 594 of the Complaint.

595. DENY the truth of the allegations contained in Paragraph 595 of the Complaint.

596. DENY the truth of the allegations contained in Paragraph 596 of the Complaint.

597. DENY the truth of the allegations contained in Paragraph 597 of the Complaint.

598. DENY the truth of the allegations contained in Paragraph 598 of the Complaint.

599. DENY the truth of the allegations contained in Paragraph 599 of the Complaint.

600. DENY the truth of the allegations contained in Paragraph 600 of the Complaint.

601. DENY the truth of the allegations contained in Paragraph 601 of the Complaint.

602. DENY the truth of the allegations contained in Paragraph 602 of the Complaint.

603. DENY the truth of the allegations contained in Paragraph 603 of the Complaint.

604. DENY the truth of the allegations contained in Paragraph 604 of the Complaint.

605. ADMIT the truth of the allegations contained in Paragraph 605 of the Complaint.

606. DENY the truth of the allegations contained in Paragraph 606 of the Complaint.

607. DENY the truth of the allegations contained in Paragraph 607 of the Complaint.

608. DENY the truth of the allegations contained in Paragraph 608 of the Complaint.

609. DENY the truth of the allegations contained in Paragraph 609 of the Complaint.

610. DENY the truth of the allegations contained in Paragraph 610 of the Complaint.

611. DENY the truth of the allegations contained in Paragraph 611 of the Complaint.

612. DENY the truth of the allegations contained in Paragraph 612 of the Complaint except ADMIT Mr. McCausland was not paid premium overtime compensation for hours worked in excess of 40 per week.

613. ADMIT the truth of the allegations contained in Paragraph 613 of the Complaint.

614. ADMIT the truth of the allegations contained in Paragraph 614 of the Complaint.

615. DENY the truth of the allegations contained in Paragraph 615 of the Complaint.

616. DENY the truth of the allegations contained in Paragraph 616 of the Complaint.

617. DENY the truth of the allegations contained in Paragraph 617 of the Complaint.

618. DENY the truth of the allegations contained in Paragraph 618 of the Complaint.

619. DENY the truth of the allegations contained in Paragraph 619 of the Complaint.

620. DENY the truth of the allegations contained in Paragraph 620 of the Complaint.

621. DENY the truth of the allegations contained in Paragraph 621 of the Complaint.

622. DENY the truth of the allegations contained in Paragraph 622 of the Complaint.

623. DENY the truth of the allegations contained in Paragraph 623 of the Complaint.

624. ADMIT the truth of the allegations contained in Paragraph 624 of the Complaint.

625. DENY the truth of the allegations contained in Paragraph 625 of the Complaint.

626. DENY the truth of the allegations contained in Paragraph 626 of the Complaint.

627. DENY the truth of the allegations contained in Paragraph 627 of the Complaint.

628. DENY the truth of the allegations contained in Paragraph 628 of the Complaint.

629. DENY the truth of the allegations contained in Paragraph 629 of the Complaint.

630. DENY the truth of the allegations contained in Paragraph 630 of the Complaint.

631. DENY the truth of the allegations contained in Paragraph 631 of the Complaint.

632. DENY the truth of the allegations contained in Paragraph 632 of the Complaint.

633. DENY the truth of the allegations contained in Paragraph 633 of the Complaint.

634. DENY the truth of the allegations contained in Paragraph 634 of the Complaint.

635. DENY the truth of the allegations contained in Paragraph 635 of the Complaint.

636. DENY the truth of the allegations contained in Paragraph 636 of the Complaint.

637. DENY the truth of the allegations contained in Paragraph 637 of the Complaint.

638. DENY the truth of the allegations contained in Paragraph 638 of the Complaint.

639. DENY the truth of the allegations contained in Paragraph 639 of the Complaint.

640. DENY the truth of the allegations contained in Paragraph 640 of the Complaint.

641. DENY the truth of the allegations contained in Paragraph 641 of the Complaint.

642. DENY the truth of the allegations contained in Paragraph 642 of the Complaint.

643. DENY the truth of the allegations contained in Paragraph 643 of the Complaint.

644. DENY the truth of the allegations contained in Paragraph 644 of the Complaint.

645. DENY the truth of the allegations contained in Paragraph 645 of the Complaint.

646. DENY the truth of the allegations contained in Paragraph 646 of the Complaint.

647. DENY the truth of the allegations contained in Paragraph 647 of the Complaint.

648. DENY the truth of the allegations contained in Paragraph 648 of the Complaint.

649. DENY the truth of the allegations contained in Paragraph 649 of the Complaint.

650. DENY the truth of the allegations contained in Paragraph 650 of the Complaint.

651. DENY the truth of the allegations contained in Paragraph 651 of the Complaint.

652. DENY the truth of the allegations contained in Paragraph 652 of the Complaint.

653. DENY the truth of the allegations contained in Paragraph 653 of the Complaint.

654. DENY the truth of the allegations contained in Paragraph 654 of the Complaint.

655. DENY the truth of the allegations contained in Paragraph 655 of the Complaint.

656. DENY the truth of the allegations contained in Paragraph 656 of the Complaint.

657. DENY the truth of the allegations contained in Paragraph 657 of the Complaint.

658. ADMIT the truth of the allegations contained in Paragraph 658 of the Complaint.

659. DENY the truth of the allegations contained in Paragraph 659 of the Complaint.

660. DENY the truth of the allegations contained in Paragraph 660 of the Complaint.

661. DENY the truth of the allegations contained in Paragraph 661 of the Complaint.

662. DENY the truth of the allegations contained in Paragraph 662 of the Complaint.

663. DENY the truth of the allegations contained in Paragraph 663 of the Complaint.

664. DENY the truth of the allegations contained in Paragraph 664 of the Complaint.

665. DENY the truth of the allegations contained in Paragraph 665 of the Complaint except ADMIT that Mr. Meneghin was not paid premium overtime compensation for hours worked in excess of 40 per week.

666. ADMIT the truth of the allegations contained in Paragraph 666 of the Complaint.

667. ADMIT the truth of the allegations contained in Paragraph 667 of the Complaint.

668. DENY the truth of the allegations contained in Paragraph 668 of the Complaint.

669. DENY the truth of the allegations contained in Paragraph 669 of the Complaint.

670. DENY the truth of the allegations contained in Paragraph 670 of the Complaint.

671. DENY the truth of the allegations contained in Paragraph 671 of the Complaint.

672. DENY the truth of the allegations contained in Paragraph 672 of the Complaint.

673. DENY the truth of the allegations contained in Paragraph 673 of the Complaint.

674. DENY the truth of the allegations contained in Paragraph 674 of the Complaint.

675. DENY the truth of the allegations contained in Paragraph 675 of the Complaint.

676. DENY the truth of the allegations contained in Paragraph 676 of the Complaint.

677. ADMIT the truth of the allegations contained in Paragraph 677 of the Complaint.

678. DENY the truth of the allegations contained in Paragraph 678 of the Complaint.

679. DENY the truth of the allegations contained in Paragraph 679 of the Complaint.

680. DENY the truth of the allegations contained in Paragraph 680 of the Complaint.

681. DENY the truth of the allegations contained in Paragraph 681 of the Complaint.

682. DENY the truth of the allegations contained in Paragraph 682 of the Complaint.

683. DENY the truth of the allegations contained in Paragraph 683 of the Complaint.

684. DENY the truth of the allegations contained in Paragraph 684 of the Complaint.

685. DENY the truth of the allegations contained in Paragraph 685 of the Complaint.

686. DENY the truth of the allegations contained in Paragraph 686 of the Complaint.

687. DENY the truth of the allegations contained in Paragraph 687 of the Complaint.

688. DENY the truth of the allegations contained in Paragraph 688 of the Complaint.

689. DENY the truth of the allegations contained in Paragraph 689 of the Complaint.

690. DENY the truth of the allegations contained in Paragraph 690 of the Complaint.

691. DENY the truth of the allegations contained in Paragraph 691 of the Complaint.

692. DENY the truth of the allegations contained in Paragraph 692 of the Complaint.

693. DENY the truth of the allegations contained in Paragraph 693 of the Complaint.

694. DENY the truth of the allegations contained in Paragraph 694 of the Complaint.

695. DENY the truth of the allegations contained in Paragraph 695 of the Complaint.

696. DENY the truth of the allegations contained in Paragraph 696 of the Complaint.

697. DENY the truth of the allegations contained in Paragraph 697 of the Complaint.

698. DENY the truth of the allegations contained in Paragraph 698 of the Complaint.

699. DENY the truth of the allegations contained in Paragraph 699 of the Complaint.

700. DENY the truth of the allegations contained in Paragraph 700 of the Complaint.

701. DENY the truth of the allegations contained in Paragraph 701 of the Complaint.

702. DENY the truth of the allegations contained in Paragraph 702 of the Complaint.

703. DENY the truth of the allegations contained in Paragraph 703 of the Complaint.

704. DENY the truth of the allegations contained in Paragraph 704 of the Complaint.

705. DENY the truth of the allegations contained in Paragraph 705 of the Complaint.

706. DENY the truth of the allegations contained in Paragraph 706 of the Complaint.

707. DENY the truth of the allegations contained in Paragraph 707 of the Complaint.

708. DENY the truth of the allegations contained in Paragraph 708 of the Complaint.

709. DENY the truth of the allegations contained in Paragraph 709 of the Complaint.

710. DENY the truth of the allegations contained in Paragraph 710 of the Complaint.

711. DENY the truth of the allegations contained in Paragraph 711 of the Complaint.

712. DENY the truth of the allegations contained in Paragraph 712 of the Complaint.

713. ADMIT the truth of the allegations contained in Paragraph 713 of the Complaint.

714. DENY the truth of the allegations contained in Paragraph 714 of the Complaint.

715. DENY the truth of the allegations contained in Paragraph 715 of the Complaint.

716. DENY the truth of the allegations contained in Paragraph 716 of the Complaint.

717. DENY the truth of the allegations contained in Paragraph 717 of the Complaint.

718. DENY the truth of the allegations contained in Paragraph 718 of the Complaint.

719. DENY the truth of the allegations contained in Paragraph 719 of the Complaint.

720. DENY the truth of the allegations contained in Paragraph 720 of the Complaint except ADMIT that Mr. Mylenski was not paid premium overtime compensation for hours worked in excess of 40 per week.

721. ADMIT the truth of the allegations contained in Paragraph 721 of the Complaint.

722. ADMIT the truth of the allegations contained in Paragraph 722 of the Complaint.

723. DENY the truth of the allegations contained in Paragraph 723 of the Complaint.

724. DENY the truth of the allegations contained in Paragraph 724 of the Complaint.

725. DENY the truth of the allegations contained in Paragraph 725 of the Complaint.

726. DENY the truth of the allegations contained in Paragraph 726 of the Complaint.

727. DENY the truth of the allegations contained in Paragraph 727 of the Complaint.

728. DENY the truth of the allegations contained in Paragraph 728 of the Complaint.

729. DENY the truth of the allegations contained in Paragraph 729 of the Complaint.

730. DENY the truth of the allegations contained in Paragraph 730 of the Complaint.

731. DENY the truth of the allegations contained in Paragraph 731 of the Complaint.

732. DENY the truth of the allegations contained in Paragraph 732 of the Complaint.

733. DENY the truth of the allegations contained in Paragraph 733 of the Complaint.

734. DENY the truth of the allegations contained in Paragraph 734 of the Complaint.

735. DENY the truth of the allegations contained in Paragraph 735 of the Complaint.

736. DENY the truth of the allegations contained in Paragraph 736 of the Complaint.

737. DENY the truth of the allegations contained in Paragraph 737 of the Complaint.

738. DENY the truth of the allegations contained in Paragraph 738 of the Complaint.

739. DENY the truth of the allegations contained in Paragraph 739 of the Complaint.

740. DENY the truth of the allegations contained in Paragraph 740 of the Complaint.

741. DENY the truth of the allegations contained in Paragraph 741 of the Complaint.

742. DENY the truth of the allegations contained in Paragraph 742 of the Complaint.

743. DENY the truth of the allegations contained in Paragraph 743 of the Complaint.

744. DENY the truth of the allegations contained in Paragraph 744 of the Complaint.

745. DENY the truth of the allegations contained in Paragraph 745 of the Complaint.

746. DENY the truth of the allegations contained in Paragraph 746 of the Complaint.

747. DENY the truth of the allegations contained in Paragraph 747 of the Complaint.

748. DENY the truth of the allegations contained in Paragraph 748 of the Complaint.

749. DENY the truth of the allegations contained in Paragraph 749 of the Complaint.

750. DENY the truth of the allegations contained in Paragraph 750 of the Complaint.

751. DENY the truth of the allegations contained in Paragraph 751 of the Complaint.

752. DENY the truth of the allegations contained in Paragraph 752 of the Complaint.

753. DENY the truth of the allegations contained in Paragraph 753 of the Complaint.

754. DENY the truth of the allegations contained in Paragraph 754 of the Complaint.

755. DENY the truth of the allegations contained in Paragraph 755 of the Complaint.

756. DENY the truth of the allegations contained in Paragraph 756 of the Complaint.

757. DENY the truth of the allegations contained in Paragraph 757 of the Complaint.

758. DENY the truth of the allegations contained in Paragraph 758 of the Complaint.

759. DENY the truth of the allegations contained in Paragraph 759 of the Complaint.

760. DENY the truth of the allegations contained in Paragraph 760 of the Complaint.

761. DENY the truth of the allegations contained in Paragraph 761 of the Complaint.

762. DENY the truth of the allegations contained in Paragraph 762 of the Complaint.

763. DENY the truth of the allegations contained in Paragraph 763 of the Complaint.

764. DENY the truth of the allegations contained in Paragraph 764 of the Complaint.

765. DENY the truth of the allegations contained in Paragraph 765 of the Complaint.

766. DENY the truth of the allegations contained in Paragraph 766 of the Complaint.

767. DENY the truth of the allegations contained in Paragraph 767 of the Complaint.

768. DENY the truth of the allegations contained in Paragraph 768 of the Complaint.

769. ADMIT the truth of the allegations contained in Paragraph 769 of the Complaint.

770. DENY the truth of the allegations contained in Paragraph 770 of the Complaint.

771. DENY the truth of the allegations contained in Paragraph 771 of the Complaint.

772. DENY the truth of the allegations contained in Paragraph 772 of the Complaint.

773. DENY the truth of the allegations contained in Paragraph 773 of the Complaint.

774. DENY the truth of the allegations contained in Paragraph 774 of the Complaint.

775. DENY the truth of the allegations contained in Paragraph 775 of the Complaint.

776. DENY the truth of the allegations contained in Paragraph 776 of the Complaint.

777. DENY the truth of the allegations contained in Paragraph 777 of the Complaint.

778. DENY the truth of the allegations contained in Paragraph 778 of the Complaint.

779. DENY the truth of the allegations contained in Paragraph 779 of the Complaint.

780. DENY the truth of the allegations contained in Paragraph 780 of the Complaint.

781. DENY the truth of the allegations contained in Paragraph 781 of the Complaint.

782. DENY the truth of the allegations contained in Paragraph 782 of the Complaint.

783. ADMIT the truth of the allegations contained in Paragraph 783 of the Complaint.

784. DENY the truth of the allegations contained in Paragraph 784 of the Complaint.

785. DENY the truth of the allegations contained in Paragraph 785 of the Complaint.

786. DENY the truth of the allegations contained in Paragraph 786 of the Complaint.

787. DENY the truth of the allegations contained in Paragraph 787 of the Complaint.

788. DENY the truth of the allegations contained in Paragraph 788 of the Complaint.

789. DENY the truth of the allegations contained in Paragraph 789 of the Complaint.

790. DENY the truth of the allegations contained in Paragraph 790 of the Complaint except ADMIT that Mr. Palazzolo was not paid premium overtime compensation for hours worked in excess of 40 per week.

791. ADMIT the truth of the allegations contained in Paragraph 791 of the Complaint.

792. ADMIT the truth of the allegations contained in Paragraph 792 of the Complaint.

793. DENY the truth of the allegations contained in Paragraph 793 of the Complaint.

794. DENY the truth of the allegations contained in Paragraph 794 of the Complaint.

795. DENY the truth of the allegations contained in Paragraph 795 of the Complaint.

796. DENY the truth of the allegations contained in Paragraph 796 of the Complaint.

797. DENY the truth of the allegations contained in Paragraph 797 of the Complaint.

798. DENY the truth of the allegations contained in Paragraph 798 of the Complaint.

799. DENY the truth of the allegations contained in Paragraph 799 of the Complaint.

800. DENY the truth of the allegations contained in Paragraph 800 of the Complaint.

801. DENY the truth of the allegations contained in Paragraph 801 of the Complaint.

802. ADMIT the truth of the allegations contained in Paragraph 802 of the Complaint.

803. DENY the truth of the allegations contained in Paragraph 803 of the Complaint.

804. DENY the truth of the allegations contained in Paragraph 804 of the Complaint.

805. DENY the truth of the allegations contained in Paragraph 805 of the Complaint.

806. DENY the truth of the allegations contained in Paragraph 806 of the Complaint.

807. DENY the truth of the allegations contained in Paragraph 807 of the Complaint.

808. DENY the truth of the allegations contained in Paragraph 808 of the Complaint.

809. DENY the truth of the allegations contained in Paragraph 809 of the Complaint.

810. DENY the truth of the allegations contained in Paragraph 810 of the Complaint.

811. DENY the truth of the allegations contained in Paragraph 811 of the Complaint.

812. DENY the truth of the allegations contained in Paragraph 812 of the Complaint.

813. DENY the truth of the allegations contained in Paragraph 813 of the Complaint.

814. DENY the truth of the allegations contained in Paragraph 814 of the Complaint.

815. DENY the truth of the allegations contained in Paragraph 815 of the Complaint.

816. DENY the truth of the allegations contained in Paragraph 816 of the Complaint.

817. DENY the truth of the allegations contained in Paragraph 817 of the Complaint.

818. DENY the truth of the allegations contained in Paragraph 818 of the Complaint.

819. DENY the truth of the allegations contained in Paragraph 819 of the Complaint.

820. DENY the truth of the allegations contained in Paragraph 820 of the Complaint.

821. DENY the truth of the allegations contained in Paragraph 821 of the Complaint.

822. DENY the truth of the allegations contained in Paragraph 822 of the Complaint.

823. DENY the truth of the allegations contained in Paragraph 823 of the Complaint.

824. DENY the truth of the allegations contained in Paragraph 824 of the Complaint.

825. DENY the truth of the allegations contained in Paragraph 825 of the Complaint.

826. DENY the truth of the allegations contained in Paragraph 826 of the Complaint.

827. DENY the truth of the allegations contained in Paragraph 827 of the Complaint.

828. DENY the truth of the allegations contained in Paragraph 828 of the Complaint.

829. DENY the truth of the allegations contained in Paragraph 829 of the Complaint.

830. DENY the truth of the allegations contained in Paragraph 830 of the Complaint.

831. DENY the truth of the allegations contained in Paragraph 831 of the Complaint.

832. DENY the truth of the allegations contained in Paragraph 832 of the Complaint.

833. DENY the truth of the allegations contained in Paragraph 833 of the Complaint.

834. DENY the truth of the allegations contained in Paragraph 834 of the Complaint.

835. DENY the truth of the allegations contained in Paragraph 835 of the Complaint.

836. DENY the truth of the allegations contained in Paragraph 836 of the Complaint.

837. DENY the truth of the allegations contained in Paragraph 837 of the Complaint.

838. DENY the truth of the allegations contained in Paragraph 838 of the Complaint.

839. DENY the truth of the allegations contained in Paragraph 839 of the Complaint.

840. ADMIT the truth of the allegations contained in Paragraph 840 of the Complaint.

841. DENY the truth of the allegations contained in Paragraph 841 of the Complaint.

842. DENY the truth of the allegations contained in Paragraph 842 of the Complaint.

843. DENY the truth of the allegations contained in Paragraph 843 of the Complaint.

844. DENY the truth of the allegations contained in Paragraph 844 of the Complaint.

845. DENY the truth of the allegations contained in Paragraph 845 of the Complaint.

846. DENY the truth of the allegations contained in Paragraph 846 of the Complaint.

847. DENY the truth of the allegations contained in Paragraph 847 of the Complaint.

848. DENY the truth of the allegations contained in Paragraph 848 of the Complaint.

849. DENY the truth of the allegations contained in Paragraph 849 of the Complaint.

850. DENY the truth of the allegations contained in Paragraph 850 of the Complaint.

851. DENY the truth of the allegations contained in Paragraph 851 of the Complaint.

852. DENY the truth of the allegations contained in Paragraph 852 of the Complaint.

853. DENY the truth of the allegations contained in Paragraph 853 of the Complaint.

854. ADMIT the truth of the allegations contained in Paragraph 854 of the Complaint.

855. DENY the truth of the allegations contained in Paragraph 855 of the Complaint.

856. DENY the truth of the allegations contained in Paragraph 856 of the Complaint.

857. DENY the truth of the allegations contained in Paragraph 857 of the Complaint.

858. DENY the truth of the allegations contained in Paragraph 858 of the Complaint.

859. DENY the truth of the allegations contained in Paragraph 859 of the Complaint.

860. DENY the truth of the allegations contained in Paragraph 860 of the Complaint.

861. DENY the truth of the allegations contained in Paragraph 861 of the Complaint except ADMIT that Ms. Park was not paid premium overtime compensation for hours worked in excess of 40 per week.

862. DENY the truth of the allegations contained in Paragraph 862 of the Complaint.

863. DENY the truth of the allegations contained in Paragraph 863 of the Complaint.

864. DENY the truth of the allegations contained in Paragraph 864 of the Complaint.

865. ADMIT the truth of the allegations contained in Paragraph 865 of the Complaint.

866. DENY the truth of the allegations contained in Paragraph 866 of the Complaint.

867. DENY the truth of the allegations contained in Paragraph 867 of the Complaint.

868. DENY the truth of the allegations contained in Paragraph 868 of the Complaint.

869. DENY the truth of the allegations contained in Paragraph 869 of the Complaint.

870. DENY the truth of the allegations contained in Paragraph 870 of the Complaint.

871. DENY the truth of the allegations contained in Paragraph 871 of the Complaint.

872. DENY the truth of the allegations contained in Paragraph 872 of the Complaint.

873. ADMIT the truth of the allegations contained in Paragraph 873 of the Complaint.

874. DENY the truth of the allegations contained in Paragraph 874 of the Complaint.

875. DENY the truth of the allegations contained in Paragraph 875 of the Complaint.

876. DENY the truth of the allegations contained in Paragraph 876 of the Complaint.

877. DENY the truth of the allegations contained in Paragraph 877 of the Complaint.

878. DENY the truth of the allegations contained in Paragraph 878 of the Complaint.

879. DENY the truth of the allegations contained in Paragraph 879 of the Complaint.

880. DENY the truth of the allegations contained in Paragraph 880 of the Complaint.

881. DENY the truth of the allegations contained in Paragraph 881 of the Complaint.

882. DENY the truth of the allegations contained in Paragraph 882 of the Complaint.

883. DENY the truth of the allegations contained in Paragraph 883 of the Complaint.

884. DENY the truth of the allegations contained in Paragraph 884 of the Complaint.

885. DENY the truth of the allegations contained in Paragraph 885 of the Complaint.

886. DENY the truth of the allegations contained in Paragraph 886 of the Complaint.

887. DENY the truth of the allegations contained in Paragraph 887 of the Complaint.

888. DENY the truth of the allegations contained in Paragraph 888 of the Complaint.

889. DENY the truth of the allegations contained in Paragraph 889 of the Complaint.

890. DENY the truth of the allegations contained in Paragraph 890 of the Complaint.

891. DENY the truth of the allegations contained in Paragraph 891 of the Complaint.

892. DENY the truth of the allegations contained in Paragraph 892 of the Complaint.

893. DENY the truth of the allegations contained in Paragraph 893 of the Complaint.

894. DENY the truth of the allegations contained in Paragraph 894 of the Complaint.

895. DENY the truth of the allegations contained in Paragraph 895 of the Complaint.

896. DENY the truth of the allegations contained in Paragraph 896 of the Complaint.

897. DENY the truth of the allegations contained in Paragraph 897 of the Complaint.

898. DENY the truth of the allegations contained in Paragraph 898 of the Complaint.

899. DENY the truth of the allegations contained in Paragraph 899 of the Complaint.

900. DENY the truth of the allegations contained in Paragraph 900 of the Complaint.

901. DENY the truth of the allegations contained in Paragraph 901 of the Complaint.

902. DENY the truth of the allegations contained in Paragraph 902 of the Complaint.

903. DENY the truth of the allegations contained in Paragraph 903 of the Complaint.

904. DENY the truth of the allegations contained in Paragraph 904 of the Complaint.

905. DENY the truth of the allegations contained in Paragraph 905 of the Complaint.

906. DENY the truth of the allegations contained in Paragraph 906 of the Complaint.

907. DENY the truth of the allegations contained in Paragraph 907 of the Complaint.

908. DENY the truth of the allegations contained in Paragraph 908 of the Complaint.

909. DENY the truth of the allegations contained in Paragraph 909 of the Complaint.

910. DENY the truth of the allegations contained in Paragraph 910 of the Complaint.

911. DENY the truth of the allegations contained in Paragraph 911 of the Complaint.

912. DENY the truth of the allegations contained in Paragraph 912 of the Complaint.

913. DENY the truth of the allegations contained in Paragraph 913 of the Complaint.

914. DENY the truth of the allegations contained in Paragraph 914 of the Complaint.

915. DENY the truth of the allegations contained in Paragraph 915 of the Complaint.

916. DENY the truth of the allegations contained in Paragraph 916 of the Complaint except ADMIT that Mr. Roche was not paid premium overtime compensation for hours worked in excess of 40 per week.

917. DENY the truth of the allegations contained in Paragraph 917 of the Complaint.

918. ADMIT the truth of the allegations contained in Paragraph 918 of the Complaint.

919. DENY the truth of the allegations contained in Paragraph 919 of the Complaint.

920. DENY the truth of the allegations contained in Paragraph 920 of the Complaint.

921. DENY the truth of the allegations contained in Paragraph 921 of the Complaint.

922. DENY the truth of the allegations contained in Paragraph 922 of the Complaint.

923. DENY the truth of the allegations contained in Paragraph 923 of the Complaint.

924. DENY the truth of the allegations contained in Paragraph 924 of the Complaint.

925. DENY the truth of the allegations contained in Paragraph 925 of the Complaint.

926. DENY the truth of the allegations contained in Paragraph 926 of the Complaint.

927. DENY the truth of the allegations contained in Paragraph 927 of the Complaint.

928. ADMIT the truth of the allegations contained in Paragraph 928 of the Complaint.

929. DENY the truth of the allegations contained in Paragraph 929 of the Complaint.

930. DENY the truth of the allegations contained in Paragraph 930 of the Complaint.

931. DENY the truth of the allegations contained in Paragraph 931 of the Complaint.

932. DENY the truth of the allegations contained in Paragraph 932 of the Complaint.

933. DENY the truth of the allegations contained in Paragraph 933 of the Complaint.

934. DENY the truth of the allegations contained in Paragraph 934 of the Complaint.

935. DENY the truth of the allegations contained in Paragraph 935 of the Complaint.

936. DENY the truth of the allegations contained in Paragraph 936 of the Complaint.

937. DENY the truth of the allegations contained in Paragraph 937 of the Complaint.

938. DENY the truth of the allegations contained in Paragraph 938 of the Complaint.

939. DENY the truth of the allegations contained in Paragraph 939 of the Complaint.

940. DENY the truth of the allegations contained in Paragraph 940 of the Complaint.

941. DENY the truth of the allegations contained in Paragraph 941 of the Complaint.

942. DENY the truth of the allegations contained in Paragraph 942 of the Complaint.

943. DENY the truth of the allegations contained in Paragraph 943 of the Complaint.

944. DENY the truth of the allegations contained in Paragraph 944 of the Complaint.

945. DENY the truth of the allegations contained in Paragraph 945 of the Complaint.

946. DENY the truth of the allegations contained in Paragraph 946 of the Complaint.

947. DENY the truth of the allegations contained in Paragraph 947 of the Complaint.

948. DENY the truth of the allegations contained in Paragraph 948 of the Complaint.

949. DENY the truth of the allegations contained in Paragraph 949 of the Complaint.

950. DENY the truth of the allegations contained in Paragraph 950 of the Complaint.

951. DENY the truth of the allegations contained in Paragraph 951 of the Complaint.

952. DENY the truth of the allegations contained in Paragraph 952 of the Complaint.

953. DENY the truth of the allegations contained in Paragraph 953 of the Complaint.

954. DENY the truth of the allegations contained in Paragraph 954 of the Complaint.

955. DENY the truth of the allegations contained in Paragraph 955 of the Complaint.

956. DENY the truth of the allegations contained in Paragraph 956 of the Complaint.

957. DENY the truth of the allegations contained in Paragraph 957 of the Complaint.

958. DENY the truth of the allegations contained in Paragraph 958 of the Complaint.

959. DENY the truth of the allegations contained in Paragraph 959 of the Complaint.

960. DENY the truth of the allegations contained in Paragraph 960 of the Complaint.

961. DENY the truth of the allegations contained in Paragraph 961 of the Complaint.

962. DENY the truth of the allegations contained in Paragraph 962 of the Complaint.

963. DENY the truth of the allegations contained in Paragraph 963 of the Complaint.

964. DENY the truth of the allegations contained in Paragraph 964 of the Complaint.

965. ADMIT the truth of the allegations contained in Paragraph 965 of the Complaint.

966. DENY the truth of the allegations contained in Paragraph 966 of the Complaint.

967. DENY the truth of the allegations contained in Paragraph 967 of the Complaint.

968. DENY the truth of the allegations contained in Paragraph 968 of the Complaint.

969. DENY the truth of the allegations contained in Paragraph 969 of the Complaint.

970. DENY the truth of the allegations contained in Paragraph 970 of the Complaint.

971. DENY the truth of the allegations contained in Paragraph 971 of the Complaint.

972. DENY the truth of the allegations contained in Paragraph 972 of the Complaint.

973. DENY the truth of the allegations contained in Paragraph 973 of the Complaint.

974. DENY the truth of the allegations contained in Paragraph 974 of the Complaint.

975. DENY the truth of the allegations contained in Paragraph 975 of the Complaint.

976. DENY the truth of the allegations contained in Paragraph 976 of the Complaint.

977. DENY the truth of the allegations contained in Paragraph 977 of the Complaint.

978. DENY the truth of the allegations contained in Paragraph 978 of the Complaint.

979. DENY the truth of the allegations contained in Paragraph 979 of the Complaint.

980. DENY the truth of the allegations contained in Paragraph 980 of the Complaint.

981. DENY the truth of the allegations contained in Paragraph 981 of the Complaint.

982. DENY the truth of the allegations contained in Paragraph 982 of the Complaint.

983. DENY the truth of the allegations contained in Paragraph 983 of the Complaint.

984. DENY the truth of the allegations contained in Paragraph 984 of the Complaint.

985. DENY the truth of the allegations contained in Paragraph 985 of the Complaint.

986. DENY the truth of the allegations contained in Paragraph 986 of the Complaint except ADMIT that Mr. Tomasiello was not paid premium overtime compensation for hours worked in excess of 40 per week.

987. DENY the truth of the allegations contained in Paragraph 987 of the Complaint.

988. ADMIT the truth of the allegations contained in Paragraph 988 of the Complaint.

989. DENY the truth of the allegations contained in Paragraph 989 of the Complaint.

990. DENY the truth of the allegations contained in Paragraph 990 of the Complaint.

991. DENY the truth of the allegations contained in Paragraph 991 of the Complaint.

992. DENY the truth of the allegations contained in Paragraph 992 of the Complaint.

993. DENY the truth of the allegations contained in Paragraph 993 of the Complaint.

994. DENY the truth of the allegations contained in Paragraph 994 of the Complaint.

995. DENY the truth of the allegations contained in Paragraph 995 of the Complaint.

996. DENY the truth of the allegations contained in Paragraph 996 of the Complaint.

997. DENY the truth of the allegations contained in Paragraph 997 of the Complaint.

998. ADMIT the truth of the allegations contained in Paragraph 998 of the Complaint.

999. DENY the truth of the allegations contained in Paragraph 999 of the Complaint.

1000. DENY the truth of the allegations contained in Paragraph 1000 of the Complaint.

1001. DENY the truth of the allegations contained in Paragraph 1001 of the Complaint.

1002. DENY the truth of the allegations contained in Paragraph 1002 of the Complaint.

1003. DENY the truth of the allegations contained in Paragraph 1003 of the Complaint.

1004. DENY the truth of the allegations contained in Paragraph 1004 of the Complaint.

1005. DENY the truth of the allegations contained in Paragraph 1005 of the Complaint.

1006. DENY the truth of the allegations contained in Paragraph 1006 of the Complaint.

1007. DENY the truth of the allegations contained in Paragraph 1007 of the Complaint.

1008. DENY the truth of the allegations contained in Paragraph 1008 of the Complaint.

1009. DENY the truth of the allegations contained in Paragraph 1009 of the Complaint.

1010. DENY the truth of the allegations contained in Paragraph 1010 of the Complaint.

1011. DENY the truth of the allegations contained in Paragraph 1011 of the Complaint.

1012. DENY the truth of the allegations contained in Paragraph 1012 of the Complaint.

1013. DENY the truth of the allegations contained in Paragraph 1013 of the Complaint.

1014. DENY the truth of the allegations contained in Paragraph 1014 of the Complaint.

1015. DENY the truth of the allegations contained in Paragraph 1015 of the Complaint.

1016. DENY the truth of the allegations contained in Paragraph 1016 of the Complaint.

1017. DENY the truth of the allegations contained in Paragraph 1017 of the Complaint.

1018. DENY the truth of the allegations contained in Paragraph 1018 of the Complaint.

1019. DENY the truth of the allegations contained in Paragraph 1019 of the Complaint.

1020. DENY the truth of the allegations contained in Paragraph 1020 of the Complaint.

1021. DENY the truth of the allegations contained in Paragraph 1021 of the Complaint.

1022. DENY the truth of the allegations contained in Paragraph 1022 of the Complaint.

1023. DENY the truth of the allegations contained in Paragraph 1023 of the Complaint.

1024. DENY the truth of the allegations contained in Paragraph 1024 of the Complaint.

1025. DENY the truth of the allegations contained in Paragraph 1025 of the Complaint.

1026. ADMIT the truth of the allegations contained in Paragraph 1026 of the Complaint.

1027. DENY the truth of the allegations contained in Paragraph 1027 of the Complaint.

1028. DENY the truth of the allegations contained in Paragraph 1028 of the Complaint.

1029. DENY the truth of the allegations contained in Paragraph 1029 of the Complaint.

1030. DENY the truth of the allegations contained in Paragraph 1030 of the Complaint.

1031. DENY the truth of the allegations contained in Paragraph 1031 of the Complaint.

1032. DENY the truth of the allegations contained in Paragraph 1032 of the Complaint.

1033. DENY the truth of the allegations contained in Paragraph 1033 of the Complaint.

1034. DENY the truth of the allegations contained in Paragraph 1034 of the Complaint.

1035. DENY the truth of the allegations contained in Paragraph 1035 of the Complaint.

1036. DENY the truth of the allegations contained in Paragraph 1036 of the Complaint.

1037. DENY the truth of the allegations contained in Paragraph 1037 of the Complaint.

1038. DENY the truth of the allegations contained in Paragraph 1038 of the Complaint.

1039. DENY the truth of the allegations contained in Paragraph 1039 of the Complaint.

1040. DENY the truth of the allegations contained in Paragraph 1040 of the Complaint.

1041. DENY the truth of the allegations contained in Paragraph 1041 of the Complaint.

1042. DENY the truth of the allegations contained in Paragraph 1042 of the Complaint.

1043. DENY the truth of the allegations contained in Paragraph 1043 of the Complaint.

1044. DENY the truth of the allegations contained in Paragraph 1044 of the Complaint.

1045. DENY the truth of the allegations contained in Paragraph 1045 of the Complaint.

1046. DENY the truth of the allegations contained in Paragraph 1046 of the Complaint.

1047. DENY the truth of the allegations contained in Paragraph 1047 of the Complaint except ADMIT that Mr. Wong was not paid premium overtime compensation for hours worked in excess of 40 per week.

1048. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1049. DENY the truth of the allegations contained in Paragraph 1049 of the Complaint and respectfully defer all questions of law to the Court.

1050. DENY the truth of the allegations contained in Paragraph 1050 of the Complaint.

1051. DENY the truth of the allegations contained in Paragraph 1051 of the Complaint.

1052. DENY the truth of the allegations contained in Paragraph 1052 of the Complaint.

1053. DENY the truth of the allegations contained in Paragraph 1053 of the Complaint.

1054. DENY the truth of the allegations contained in Paragraph 1054 of the Complaint.

1055. DENY the truth of the allegations contained in Paragraph 1055 of the Complaint.

1056. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1057. DENY the truth of the allegations contained in Paragraph 1057 of the Complaint and respectfully refers all questions of law to the Court.

1058. DENY the truth of the allegations contained in Paragraph 1058 of the Complaint.

1059. DENY the truth of the allegations contained in Paragraph 1059 of the Complaint.

1060. DENY the truth of the allegations contained in Paragraph 1060 of the Complaint.

1061. DENY the truth of the allegations contained in Paragraph 1061 of the Complaint.

1062. DENY the truth of the allegations contained in Paragraph 1062 of the Complaint.

1063. DENY the truth of the allegations contained in Paragraph 1063 of the Complaint.

1064. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1065. DENY the truth of the allegations contained in Paragraph 1065 of the Complaint and respectfully refers all questions of law to the Court.

1066. DENY the truth of the allegations contained in Paragraph 1066 of the Complaint.

1067. DENY the truth of the allegations contained in Paragraph 1067 of the Complaint.

1068. DENY the truth of the allegations contained in Paragraph 1068 of the Complaint.

1069. DENY the truth of the allegations contained in Paragraph 1069 of the Complaint.

1070. DENY the truth of the allegations contained in Paragraph 1070 of the Complaint.

1071. DENY the truth of the allegations contained in Paragraph 1071 of the Complaint.

1072. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1073. DENY the truth of the allegations contained in Paragraph 1073 of the Complaint and respectfully refers all questions of law to the Court.

1074. DENY the truth of the allegations contained in Paragraph 1074 of the Complaint.

1075. DENY the truth of the allegations contained in Paragraph 1075 of the Complaint.

1076. DENY the truth of the allegations contained in Paragraph 1076 of the Complaint.

1077. DENY the truth of the allegations contained in Paragraph 1077 of the Complaint.

1078. DENY the truth of the allegations contained in Paragraph 1078 of the Complaint.

1079. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1080. DENY the truth of the allegations contained in Paragraph 1080 of the Complaint and respectfully refers all questions of law to the Court.

1081. DENY the truth of the allegations contained in Paragraph 1081 of the Complaint.

1082. DENY the truth of the allegations contained in Paragraph 1082 of the Complaint.

1083. DENY the truth of the allegations contained in Paragraph 1083 of the Complaint.

1084. DENY the truth of the allegations contained in Paragraph 1084 of the Complaint.

1085. DENY the truth of the allegations contained in Paragraph 1085 of the Complaint.

1086. DENY the truth of the allegations contained in Paragraph 1086 of the Complaint.

1087. DENY the truth of the allegations contained in Paragraph 1087 of the Complaint.

1088. DENY the truth of the allegations contained in Paragraph 1088 of the Complaint.

1089. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1090. DENY the truth of the allegations contained in Paragraph 1090 of the Complaint and respectfully refers all questions of law to the Court.

1091. DENY the truth of the allegations contained in Paragraph 1091 of the Complaint.

1092. DENY the truth of the allegations contained in Paragraph 1092 of the Complaint.

1093. DENY the truth of the allegations contained in Paragraph 1093 of the Complaint.

1094. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1095. DENY the truth of the allegations contained in Paragraph 1095 of the Complaint and respectfully refers all questions of law to the Court.

1096. DENY the truth of the allegations contained in Paragraph 1096 of the Complaint.

1097. DENY the truth of the allegations contained in Paragraph 1097 of the Complaint.

1098. DENY the truth of the allegations contained in Paragraph 1098 of the Complaint.

1099. DENY the truth of the allegations contained in Paragraph 1099 of the Complaint.

1100. DENY the truth of the allegations contained in Paragraph 1100 of the Complaint.

1101. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1102. DENY the truth of the allegations contained in Paragraph 1102 of the Complaint and respectfully refers all questions of law to the Court.

1103. DENY the truth of the allegations contained in Paragraph 1103 of the Complaint.

1104. DENY the truth of the allegations contained in Paragraph 1104 of the Complaint.

1105. DENY the truth of the allegations contained in Paragraph 1105 of the Complaint.

1106. DENY the truth of the allegations contained in Paragraph 1106 of the Complaint.

1107. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1108. DENY the truth of the allegations contained in Paragraph 1108 of the Complaint and respectfully refers all questions of law to the Court.

1109. DENY the truth of the allegations contained in Paragraph 1109 of the Complaint.

1110. DENY the truth of the allegations contained in Paragraph 1110 of the Complaint.

1111. DENY the truth of the allegations contained in Paragraph 1111 of the Complaint.

1112. DENY the truth of the allegations contained in Paragraph 1112 of the Complaint.

1113. DENY the truth of the allegations contained in Paragraph 1113 of the Complaint.

1114. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1115. DENY the truth of the allegations contained in Paragraph 1115 of the Complaint and respectfully refers all questions of law to the Court.

1116. DENY the truth of the allegations contained in Paragraph 1116 of the Complaint and respectfully refers all questions of law to the Court.

1117. DENY the truth of the allegations contained in Paragraph 1117 of the Complaint.

1118. DENY the truth of the allegations contained in Paragraph 1118 of the Complaint.

1119. DENY the truth of the allegations contained in Paragraph 1119 of the Complaint.

1120. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1121. DENY the truth of the allegations contained in Paragraph 1121 (a) – (o) of the Complaint.

1122. DENY the truth of the allegations contained in Paragraph 1122 of the Complaint.

1123. DENY the truth of the allegations contained in Paragraph 1123 of the Complaint.

1124. DENY the truth of the allegations contained in Paragraph 1124 of the Complaint.

1125. DENY the truth of the allegations contained in Paragraph 1125 of the Complaint.

1126. DENY the truth of the allegations contained in Paragraph 1126 of the Complaint.

1127. DENY the truth of the allegations contained in Paragraph 1127 of the Complaint.

1128. DENY the truth of the allegations contained in Paragraph 1128 of the Complaint.

1129. DENY the truth of the allegations contained in Paragraph 1129 of the Complaint.

1130. DENY the truth of the allegations contained in Paragraph 1130 of the Complaint.

1131. DENY the truth of the allegations contained in Paragraph 1131 of the Complaint.

1132. DENY the truth of the allegations contained in Paragraph 1132 of the Complaint.

1133. DENY the truth of the allegations contained in Paragraph 1133 of the Complaint.

1134. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1135. DENY the truth of the allegations contained in Paragraph 1135 of the Complaint.

1136. DENY the truth of the allegations contained in Paragraph 1136 of the Complaint.

1137. DENY the truth of the allegations contained in Paragraph 1137 of the Complaint.

1138. DENY the truth of the allegations contained in Paragraph 1138 of the Complaint.

1139. DENY the truth of the allegations contained in Paragraph 1139 of the Complaint.

1140. DENY the truth of the allegations contained in Paragraph 1140 of the Complaint.

1141. DENY the truth of the allegations contained in Paragraph 1141 of the Complaint.

1142. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1143. DENY the truth of the allegations contained in Paragraph 1143 of the Complaint.

1144. DENY the truth of the allegations contained in Paragraph 1144 of the Complaint.

1145. DENY the truth of the allegations contained in Paragraph 1145 of the Complaint.

1146. DENY the truth of the allegations contained in Paragraph 1146 of the Complaint.

1147. DENY the truth of the allegations contained in Paragraph 1147 of the Complaint.

1148. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1149. DENY the truth of the allegations contained in Paragraph 1149 of the Complaint.

1150. DENY the truth of the allegations contained in Paragraph 1150 of the Complaint.

1151. DENY the truth of the allegations contained in Paragraph 1151 of the Complaint.

1152. Defendants repeat and reallege each and every answer contained in every preceding paragraph as if fully set forth herein.

1153. DENY the truth of the allegations contained in Paragraph 1153 of the Complaint.

1154. DENY the truth of the allegations contained in Paragraph 1154 of the Complaint.

1155. DENY the truth of the allegations contained in Paragraph 1155 of the Complaint.

1156. DENY the truth of the allegations contained in Paragraph 1156 of the Complaint.

1157. DENY the truth of the allegations contained in Paragraph 1157 of the Complaint.

1158. DENY the truth of the allegations contained in Paragraph 1158 of the Complaint.

1159. DENY that Plaintiffs or any of the putative class or collective members are entitled to any relief requested in the Prayer for Relief paragraph (A) – (Q).

1160. DENY each and every allegation in the Complaint not heretofore expressly admitted herein.

AS AND FOR A FIRST DEFENSE

1161. The Complaint fails to state a claim, in whole or in part, upon which relief may be granted as against any defendant.

AS AND FOR A SECOND DEFENSE

1162. The Complaint fails to state a claim upon which relief can be granted under the Fair Labor Standards Act (FLSA).

AS AND FOR A THIRD DEFENSE

1163. The Complaint fails to state a claim upon which relief can be granted under the New York Labor Law.

AS AND FOR A FOURTH DEFENSE

1164. The Complaint fails to state a claim upon which relief can be granted under the Internal Revenue Code.

AS AND FOR A FIFTH DEFENSE

1165. The Complaint fails to state a claim upon which relief can be granted under the Employee Retirement Income Security Act (ERISA).

AS AND FOR A SIXTH DEFENSE

1166. The Complaint fails to state a claim upon which relief can be granted for Fraud in the Inducement.

AS AND FOR A SEVENTH DEFENSE

1167. The Complaint fails to state a claim upon which relief can be granted for Fraud in the Concealment.

AS AND FOR AN EIGHTH DEFENSE

1168. The Complaint fails to state a claim upon which relief can be granted for Promissory Estoppel.

AS AND FOR A NINTH DEFENSE

1169. The Complaint fails to state a claim upon which relief can be granted for Unjust Enrichment.

AS AND FOR A TENTH DEFENSE

1170. The Complaint fails to state a claim upon which relief can be granted for Breach of Contract.

AS AND FOR AN ELEVENTH DEFENSE

1171. Defendants had and have no intention to violate any provision of the Fair Labor Standards Act or New York Labor Law. Therefore, Defendants did not and are not willfully violating the Fair Labor Standards Act or the New York Labor Law.

AS AND FOR A TWELFTH DEFENSE

1172. The Plaintiffs and the purported collective or class members were exempt for all or part of their respective employment from the overtime and/or minimum wage pay requirements of the Fair Labor Standards Act and New York Labor Law.

AS AND FOR A THIRTEENTH DEFENSE

1173. Defendants have acted in a good faith belief that they are and were complying with all applicable provisions of the Fair Labor Standards Act and New York Labor Law.

AS AND FOR A FOURTEENTH DEFENSE

1174. The Plaintiffs' claims and those of the purported class or collective members are barred, in whole or in part, by the applicable statute of limitations.

AS AND FOR A FIFTEENTH DEFENSE

1175. The Plaintiffs lack standing to sue on behalf of the purported members of the collective or class action.

AS AND FOR A SIXTEENTH DEFENSE

1176. This case is not appropriate for a collective action because the Plaintiffs are not similarly situated to the other members of the purported collective or class action.

AS AND FOR A SEVENTEENTH DEFENSE

1177. The allegations in the Complaint do not satisfy the requirements for a collective or class action under Rule 23 of the Federal Rules of Civil Procedure.

AS AND FOR AN EIGHTEENTH DEFENSE

1178. Defendants Richard Bailes, Declan Thompson, Fraser Morrison and Peter Morrison are not employers within the meaning of the Fair Labor Standards Act and/or New York Labor Law, and are therefore not personally liable for any wages purportedly owed to the Plaintiffs and/or the purported collective or class members.

AS AND FOR A NINETEENTH DEFENSE

1179. Defendants Richard Bailes, Declan Thompson, Fraser Morrison and Peter Morrison are not individually liable for any cause of action in the Complaint, in whole or in part.

AS AND FOR A TWENTIETH DEFENSE

1180. Plaintiffs and the purported putative collective or class members are or were exempt under the Fair Labor Standards Act and New York Labor Law.

AS AND FOR A TWENTY-FIRST DEFENSE

1181. With respect to the allegations in the Complaint alleging violations of the Internal Revenue Code, the Complaint contains only a bare allegation of fraud, which is insufficient to meet the heightened pleading requirements of Rule 9(b) of the Federal Rules of Civil Procedure that apply to claims of fraud.

AS AND FOR A TWENTY-SECOND DEFENSE

1182. With respect to the allegations in the Complaint alleging violations of the Internal Revenue Code, Plaintiffs have not stated a claim for which relief may be granted, as any alleged error was neither intentional nor willful.

AS AND FOR A TWENTY-THIRD DEFENSE

1183. The Plaintiffs' claims and those of the purported class or collective members are barred are barred, in whole or in part, by the doctrine of unclean hands as Plaintiffs' conduct caused, directly or indirectly, any damages they or other purported putative class or collective class members may have suffered.

AS AND FOR A TWENTY-FIFTH DEFENSE

1184. With respect to the allegations in the Complaint alleging violations of the Employee Retirement Income Security Act (ERISA), Plaintiffs lack standing to assert some or all of the claims contained in the Complaint.

AS AND FOR A TWENTY-SIXTH DEFENSE

1185. With respect to the allegations in the Complaint alleging violations of the Employee Retirement Income Security Act (ERISA), Plaintiffs' claims and those of the purported class or collective members are barred, in whole or in part, for failure to exhaust administrative remedies.

AS AND FOR A TWENTY-SEVENTH DEFENSE

1186. With respect to the allegations in the Complaint alleging violations of the Employee Retirement Income Security Act (ERISA), some or all of the Defendants are improper defendants because they are not fiduciaries of the employee benefit plan or plans alleged in the Complaint.

AS AND FOR A TWENTY-EIGHTH DEFENSE

1187. Plaintiffs are not entitled to relief for alleged violations of the fiduciary requirements of the Employee Retirement Income Security Act (ERISA) because some or all of the alleged actions taken by Defendants were settlor functions and not subject to the fiduciary standards of ERISA.

AS AND FOR A TWENTY-NINTH DEFENSE

1188. Defendants complied with all of their obligations and duties under the employee benefit plans at issue, as well as applicable statutes and regulations.

AS AND FOR A THIRTIETH DEFENSE

1189. The Plaintiffs' claims and those of the purported class or collective members are barred, in whole or in part, by the applicable statute of limitations.

AS AND FOR A THIRTY-FIRST DEFENSE

1190. The Plaintiffs' claims and those of the purported class or collective members are barred claims and those of the purported class or collective members are barred for punitive damages are barred, in whole or in part, because Plaintiffs' claims are not authorized by law and/or Defendants did not engage in any conduct sufficient to permit an award of such damages.

AS AND FOR A THIRTY-SECOND DEFENSE

1191. The Plaintiffs' claims and those of the purported class or collective members are barred for reasonable attorneys' fees and costs and disbursements in this action are barred, in whole or in part, because Plaintiffs claims are not authorized by law and/or Defendants did not engage in any conduct sufficient to permit an award of attorneys' fees and costs and disbursements.

AS AND FOR A THIRTY-THIRD DEFENSE

1192. The Plaintiffs' claims and those of the purported class or collective members are barred for relief are barred, in whole or in part, by their failure to mitigate their damages.

AS AND FOR A THIRTY-FOURTH DEFENSE

1193. This Court lacks personal jurisdiction over some or all of the Defendants.

AS AND FOR A THIRTY-FIFTH DEFENSE

1194. The Plaintiffs' claims and those of the purported class or collective members are barred, in whole or in part, by laches, waiver and estoppel.

AS AND FOR A THIRTY-SIXTH DEFENSE

1195. To the extent any of Plaintiffs' claims, or those of the purported class or collective members, under New York law accrued outside of New York State and are pursued by a nonresident of New York, the provisions of CPLR §202 would govern and the shorter limitations period would be applicable to any such claims.

AS AND FOR A THIRTY-SEVENTH DEFENSE

1196. The Plaintiffs' claims and those of the purported class or collective members for Fraud in the Inducement are barred, in whole or in part, to the extent such claims are based upon any statement of opinion.

AS AND FOR A THIRTY-EIGHTH DEFENSE

1197. The Plaintiffs' claims and those of the purported class or collective members for Fraud in the Inducement and/or Fraud in the Concealment are barred, in whole or in part, because Defendants lacked the scienter necessary to establish such claims.

AS AND FOR A THIRTY-NINTH DEFENSE

1198. The Plaintiffs' claims and those of the purported class or collective members are barred for Fraud in the Inducement and/or Fraud in the Concealment are barred, in whole or in part, because Plaintiffs' failed to comply with the particularity requirements of Federal Rule of Civil Procedure 9(b).

AS AND FOR A FORTIETH DEFENSE

1199. The Plaintiffs' claims and those of the purported class or collective members are barred for Fraud in the Inducement, Fraud in the Concealment, Promissory Estoppel and/or Unjust Enrichment are duplicative of Plaintiffs' Breach of Contract claims.

AS AND FOR A FORTY-FIRST DEFENSE

1200. Upon information and belief, some or all of the Plaintiffs engaged in conduct detrimental to their employer's interest, and as such forfeited any compensation owed under the faithless servant doctrine.

RESERVATION OF RIGHTS

1201. Defendants reserve the right to amend or further plead any other defenses applicable to any and all counts after a reasonable opportunity for discovery.

WHEREFORE, Defendants respectfully request that the Complaint be dismissed in its entirety with prejudice, with Defendants recovering their expenses incurred herein, including costs and attorneys' fees and any such other relief this Court deems just and proper.

Dated: New York, New York
March 8, 2013

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TO: David Gottlieb, Esq. (Via ECF)
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CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2013 the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules on Electronic Service upon the following parties and participants:

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Thompson Wigdor LLP
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New York, NY 10003

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